

RM-11305 Part 97 Change Request Petition Comments

I am opposed to the petition as written.

This petition is requesting rule changes to relieve congestion in the HF phone bands. The congested bands are specifically the 75, 40, and 20 meter bands only.

160 meters, 30, 17, 12 and the 10 meter bands do not have a congestion problem and therefore do not need any rule changes.

New digital modes should be only allowed on VHF and above bands; no changes to present HF digital emissions rules. New digital emissions on the HF bands would increase congestion.

As written, RM-11305 would, in practice, have phone emissions over-run the entire band.

Referencing RM-11305's band survey Appendix A data submitted, the CW bands are under-utilized.

I recommend that the CW/RTTY/data sub-band edge be moved down in frequency, as is allowed by the IARU Region 2 Band Plan for the 80, 40, 20, and 15 meter bands as follows:

80 meter CW/RTTY/data sub-band edge be moved down to 3635 kHz. from 3750 kHz.

40 meter CW/RTTY/data sub-band edge be moved down to 7050 kHz. from 7150 kHz.

20 meter CW/RTTY/data sub-band edge be moved down to 14100 kHz. from 14150 kHz.

15 meter CW/RTTY/data sub-band edge be moved down to 21150 kHz. from 21200 kHz.

The Novice bands, which presently reside at the high-frequency end of the CW sub-band would have to be moved down also, of course.

I recommend that the Novice bands on 80, 40, and 15 meters be reduced to 25 kHz. width, and start 25 kHz. up from the low-frequency edge of the bands. No changes are needed to the 10 meter Novice band.

I recommend that the phone sub-band license classifications **within** the 75, 40, 20 and 15 meter phone bands be maintained, as a continued incentive to encourage license class upgrades.

Respectfully,

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